

1 KEITH E. EGGLETON, State Bar No. 159842
Email: keggleton@wsgr.com
2 BORIS FELDMAN, State Bar No. 128838
Email: boris.feldman@wsgr.com
3 RODNEY G. STRICKLAND, State Bar No. 161934
Email: rstrickland@wsgr.com
4 LUKE A. LISS, State Bar No. 247520
Email: lliss@wsgr.com
5 WILSON SONSINI GOODRICH & ROSATI
Professional Corporation
6 650 Page Mill Road
Palo Alto, CA 94304-1050
7 Telephone: (650) 493-9300
Facsimile: (650) 565-5100

8 Attorneys for Defendants
9 Netflix, Inc., Reed Hastings, David Wells, and
Barry McCarthy

10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
14

15 In re NETFLIX, INC., SECURITIES
LITIGATION

) Case No.: 3:12-cv-00225-SC
)

) CONSOLIDATED CLASS ACTION
)

) **STIPULATION AND [~~PROPOSED~~]**
) **SCHEDULING ORDER**
)

18 This Document Relates To:
19

20 ALL ACTIONS.
21
22
23
24
25
26
27
28

STIPULATION AND [PROPOSED]
SCHEDULING ORDER
CASE No.: 3:12-cv-00225-SC

1 WHEREAS, lead plaintiffs Arkansas Teacher Retirement System and State-Boston
2 Retirement System (“Lead Plaintiffs”) filed the First Amended Consolidated Class Action
3 Complaint for Violations of the Federal Securities Laws (the “Complaint”) against defendants
4 Netflix, Inc., Reed Hastings, David Wells, and Barry McCarthy (collectively, “Defendants”) on
5 March 22, 2013;

6 WHEREAS, pursuant to Federal Rules of Civil Procedure 6(d) and 15(a)(3), Defendants’
7 response to the Complaint is to be filed on or before April 8, 2013;

8 WHEREAS, Defendants intend to file a motion to dismiss the Complaint (the “Motion to
9 Dismiss”);

10 WHEREAS, the parties have conferred and agree that setting an appropriate schedule
11 regarding the Motion to Dismiss and related briefing is in the best interest of the parties;

12 THEREFORE, SUBJECT TO THE APPROVAL OF THE COURT, IT IS HEREBY
13 STIPULATED AND AGREED, by the undersigned, as follows:

- 14 1. Defendants’ Motion to Dismiss shall be filed on or before April 24, 2013.
- 15 2. Lead Plaintiffs’ opposition to Defendants’ Motion to Dismiss shall be filed on or
16 before May 24, 2013.
- 17 3. Defendants’ reply memorandum shall be filed on or before June 7, 2013.
- 18 4. Prior to the filing of the Motion to Dismiss, the parties shall meet and confer
19 regarding a hearing date for the Motion to Dismiss that is convenient for the parties and the
20 Court.

21 Dated: March 28, 2013

Respectfully submitted,

22 WILSON SONSINI GOODRICH & ROSATI
23 Professional Corporation
24 650 Page Mill Road
25 Palo Alto, CA 94304-1050
Telephone: (650) 493-9300
Facsimile: (650) 565-5100

26 By: /s/ Rodney G. Strickland
27 Rodney G. Strickland
28 rstrickland@wsgr.com

Attorneys for Defendants Netflix Inc., Reed
Hastings, David Wells, and Barry McCarthy

Dated: March 28, 2013

LABATON SUCHAROW LLP
Jonathan M. Plasse
Stephen W. Tountas
Serena Hallowell
140 Broadway, 34th Floor
New York, NY 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477

By: /s/ Stephen W. Tountas
Stephen W. Tountas
stountas@labaton.com

Lead Counsel for Lead Plaintiffs

*I, Rodney G. Strickland, am the ECF User whose ID and password are being used to file this
STIPULATION AND [PROPOSED] SCHEDULING ORDER. In compliance with Civil L.R. 5-
1(i)(3), I hereby attest that the Stephen W. Tountas has concurred in this filing.*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. Defendants' Motion to Dismiss shall be filed on or before April 24, 2013.
2. Lead Plaintiffs' opposition to Defendants' Motion to Dismiss shall be filed on or
before May 24, 2013.
3. Defendants' reply memorandum shall be filed on or before June 7, 2013.
4. Prior to the filing of the Motion to Dismiss, the parties shall meet and confer
regarding a hearing date for the Motion to Dismiss that is convenient for the parties and the
Court.

DATED: 03/28/2013

